

EXHIBIT A:

FISCAL YEAR 2012-2013 COSTS
Fixed Costs: \$71,035 Adjustment Proposed

Fixed costs, subject to a 29% operating margin, were incurred in fiscal year 2012-2013 in the general categories of labor-related costs, non-labor costs, costs allocated from corporate functions, equipment leases and support, depreciation and insurance. The following table compares the actual costs incurred to the costs identified as allowable in Commission Order No. 2013-349:

	Commission Order No. 2013-349	Actual Costs Incurred in FY 2012- 2013	Adjustment Proposed
Labor, Fringe and Non-labor	\$1,721,953	\$1,812,161	
Corporate Allocation (G&A)	\$661,669	\$671,203	
Equipment leases and support	\$137,918	\$65,768	
Depreciation	\$58,468	\$74,730	
Insurance	\$322,044	\$352,509	
Subtotal (Fixed Cost subject to 29% margin)	\$2,902,052	\$2,976,371	
Legal Support	\$35,338	\$32,054	
Subtotal (Fixed Cost not subject to 29% margin)	\$35,338	\$32,054	
Total Fixed Costs	\$2,937,390	\$3,008,425	\$71,035

The actual Fixed Costs incurred during fiscal year 2012-2013 were **\$3,008,425**. This amount is **\$71,035** more than the amount identified in Order Number 2013-349. Therefore, an adjustment of **\$71,035** is requested in this category of costs.

Variable Costs:

Variable Labor and Non-Labor Costs No Adjustment Proposed

Commission Order No. 2013-349 identified the following categories of rates for projecting Variable Labor and Non-Labor costs: vault purchase and inspection (per vault), ABC waste disposal (per shipment), slit trench operations (per slit trench offload), customer assistance (per shipment), and trench records (per container).

The following table illustrates the Variable Labor and Non-Labor costs that would be calculated using the Variable Labor and Non-Labor rates identified in Order No. 2013-349 and the number of units in each category.

	Units	Variable Cost Rate in Order No. 2013-349	Calculated Cost
Vault Purchase & Inspection (per vault)	59	\$186.79	\$11,020.61
ABC Waste Disposal (per shipment) (total shipments, less slit trench shipments, less irregular project shipments)	69	\$1,169.00	\$80,661
Slit Trench Operations (per slit trench offload)	0	\$23,423.00	\$0.00
Customer Assistance (per shipment)	69	\$80.75	\$5,571.75
Trench records (per container)	114	\$325.00	\$37,050.00
Total Calculated Variable Labor and Non-labor Cost			\$134,303.36

The actual Variable Labor and Non-Labor costs experienced in the disposal of waste in fiscal year 2012-2013 resulted in a Total Variable Labor and Non-Labor Cost of **\$123,917.27**. This amount is **\$10,386.09** less than the amount that would have been anticipated based on rates provided in Commission Order 2013-349. Therefore, Chem-Nuclear requests no adjustment in this category of costs.

Vault Costs

Adjustment Proposed

The following table illustrates the vault costs that would be calculated using the Variable Cost rates identified in Commission Order No. 2013-349 and the volumes of waste received in each respective category.

	Volume Buried (cubic feet)	Variable Cost Rate in Order No. 2013-349	Calculated Cost
Class A waste	5,761.02	\$40.29	\$232,111.50
Class B waste	2,481.50	\$45.63	\$113,230.85
Class C waste	510.56	\$49.62	\$25,333.99
Slit Trench waste		\$156.19	
Irregular Components (in vaults as an irregular cost)		N/A	N/A
Irregular Components (not in vaults)		N/A	N/A
Total Calculated Vault Cost			\$370,676.33
Total Volume (cubic feet)	8,753.08		

The total cost incurred for routine disposal vaults used during fiscal year 2012-2013 was **\$485,728.64**. This amount is **\$115,052** more than the amount that would have been anticipated based on rates provided in Commission Order 2013-349. Therefore, Chem-Nuclear requests an adjustment in this category of cost of **\$115,052**.

Irregular Costs

Adjustment Proposed

The following table summarizes the Irregular Costs incurred in fiscal year 2012-2013 organized by projects. Exhibit B provides additional descriptions of each of these irregular projects.

Irregular Cost Item	Order No. 2013-349	Actual FY 12-13 Labor	Actual FY 12-13 Non-Labor	Total Cost FY 12-13
Trenches (design, construct, and backfill): Trench 99.	\$116,390	\$14,901	\$126,107	\$141,008
License Renewal and Appeal costs	\$10,000	\$644		\$644
Decontamination and Corrective Actions	\$5,000	\$4,983	\$37	\$5,020
Trench records Software		\$993	\$18,027	\$19,020
Site Assessments	\$5,000			\$0
Site Maintenance		\$5,316	\$28,899	\$34,215
Other Irregular (True up of Fringe rate year to date)	\$54,782	\$374		\$374
Severance/Incentive		\$40,157		\$40,157
Institutional Overage				\$39,507
Irregular Costs	\$191,172	\$67,368	\$173,070	\$240,438
Institutional Overage plus 14%				39,507
Total Irregular Costs	\$191,172	\$67,368	\$173,070	\$279,945

The total costs incurred in fiscal year 2012-2013, as Irregular costs, were **\$279,945** compared to the amount identified in Commission Order No. 2013-349 of **\$191,172**. Chem-Nuclear therefore requests an adjustment in Irregular Costs of **\$88,773** (\$49,266 of Operations Irregular Costs and \$39,507 of Institutional Costs).

EXHIBIT B:

**FISCAL YEAR 2012-2013 IRREGULAR COSTS
ORGANIZED BY PROJECT**

PROJECT NUMBERS	PROJECT NAME AND EXPLANATIONS
188701.8029	Trench Construction and Backfill Operations (Labor \$14,901 and Non-labor \$126,107) Trench construction activities in fiscal year 2012-2013 included design, construction and backfill (including use of free flowing sand where applicable) in Trench 99.
952188.8002	Appeal DHEC License, License Administration, (Labor \$644) Non-routine activities by licensing department and others related to the appeal process for the DHEC radioactive materials license renewal. Included here are costs for CNS labor. Legal expenses are included in fixed costs.
188000.8003	Decontamination and Corrective Actions (Labor \$4,983 and Non-labor \$37) Includes costs related to decontamination efforts and corrective actions required as a result of waste received for disposal.
188000.8013	Trench records Software (Labor \$993 and Non-labor \$18,027) Cost provides the maintenance and support for trench records database and reporting software.
188004.8002	Site Maintenance (Labor \$5,316 and Non-Labor \$28,899) Included here are costs associated with maintenance of site structures and costs for the slit trench equipment structure (cover).
952182.8001 952182.8002 952186.8002 952192.8002 188004.8001 188008.8001	Other Irregular Costs (Records Retention, Waste Tracking, B&CB Support, Increased Controls) (Labor \$374) Included here are costs for true up of fringe rate year to date.
188701.8029 952186.8002	Severance/Incentives (Labor \$40,157) VP of Regulatory Affairs and Safety Incentive
189000.0002 189004.0001 189008.0001 189000.2002 952982.0001 952983.0001 952986.0001 952988.0001 955901.6002 952981.0001 952990.0001	Institutional Overage (Labor & Non-Labor \$39,507) Costs associated with institutional care over the FY 12/13 Institutional cost cap of \$2,143,597. Actual institutional cost, \$1,962,950.02, plus 14% fee of \$220,153.89 is \$2,183,103.91.

EXHIBIT C:

FISCAL YEAR 2013-2014 COSTS

We propose the following amounts be identified as allowable costs for fiscal year 2013-2014:

FIXED COSTS	
Fixed Costs to which 29% operating margin is added	
Labor, Fringe and Non-Labor	\$2,075,258
Corporate Allocations (Management Fees/G&A)	\$691,339
Depreciation	\$76,972
Insurance	\$352,509
Equipment Leases and Support	\$67,741
Fixed Costs to which 29% operating margin is not added	
Legal Support	\$33,016
Total Fixed Costs	\$3,296,835
IRREGULAR COSTS	
Trench Construction	\$143,828
License Appeal	\$10,000
Corrective Action	\$5,000
Site Maintenance	\$97,000
Site Assessments	\$5,000
Miscellaneous	\$57,782
Total Irregular Costs	\$318,610
VARIABLE COSTS	
Variable Labor and Non-Labor Rates	
Vault Purchase and Inspection (per vault)	\$156.21
ABC Waste Disposal (per shipment)	\$1,190.82
Slit Trench Operations (per slit trench offload)	\$142,299.00
Customer Assistance (per shipment)	\$93.94
Trench Records (per container)	\$261.14
Variable Material Cost Rates (Vaults)	
Class A Waste (per cubic foot)	\$37.34
Class B Waste (per cubic foot)	\$48.47
Class C Waste (per cubic foot)	\$52.15
Slit Trench Waste (per cubic foot)	\$210.00